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Trust U/A DTD 04/08/2014, Rediet Tilahun,
Tony Ray Nelson, Rickey E. Butler, Alan L.
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Dandridge, and Class Counsel for the Class*

[Additional counsel on signature page.]

**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

IN RE SNAP INC. SECURITIES
LITIGATION

Case No. 2:17-cv-03679-SVW-AGR

CLASS ACTION

This Document Relates To: All Actions.

**CLASS REPRESENTATIVES'
NOTICE OF MOTION AND MOTION
FOR FINAL APPROVAL OF THE
PROPOSED SETTLEMENT AND
PLAN OF ALLOCATION**

Date: February 22, 2021
Time: 1:30 p.m.
Courtroom: 10A, 10th Floor
Judge: Hon. Stephen V. Wilson

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on February 22, 2021, at 1:30 p.m., or as soon
3 thereafter as the matter may be heard, in the courtroom of the Honorable Stephen V.
4 Wilson, United States District Judge for the Central District of California, located at the
5 First Street Courthouse, 350 W. 1st Street, 10th Floor, Courtroom 10A, Los Angeles,
6 California, 90012, Court-appointed Class Representatives Smilka Melgoza, as trustee of
7 the Smilka Melgoza Trust U/A DTD 04/08/2014, Rediet Tilahun, Tony Ray Nelson,
8 Rickey E. Butler, Alan L. Dukes, Donald R. Allen, and Shawn B. Dandridge (collectively,
9 “Class Representatives”), by and through the undersigned attorneys, and on behalf of the
10 Court-certified Class, will and hereby do move the Court pursuant to Rule 23 of the
11 Federal Rules of Civil Procedure for orders (i) granting final approval of the proposed
12 settlement on the terms set forth in the Stipulation and Agreement of Settlement, dated
13 March 20, 2020 (“Stipulation” or “Settlement”); and (ii) approving the proposed plan for
14 allocating the net proceeds of the Settlement to the Class (“Plan of Allocation”).

15 This motion is based on this Notice of Motion and Motion, the concurrently filed
16 Memorandum of Points and Authorities, the accompanying Declaration of Sharan Nirmul
17 and exhibits attached thereto, the Stipulation, and the papers and pleadings filed in this
18 action, the arguments of counsel, and any other matters properly before the Court.

19 Class Counsel is not aware of any opposition to the motion. Pursuant to the Court’s
20 Preliminary Approval Order and subsequent Order dated November 4, 2020, any
21 objections must be filed by January 25, 2021. Proposed orders granting the relief
22 requested herein will be submitted in connection with Class Representatives’ reply
23 submission on or before February 12, 2021, pursuant to the Preliminary Approval Order
24 and after the deadline for objections has passed.

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Pursuant to Local Rule 7-3, and as set forth in the Parties' Stipulation, Class Counsel has conferred with counsel for Defendants, and Defendants do not oppose this motion although they do not adopt Class Representatives' characterization of the facts, and defendants stand on the Stipulation of Settlement.

Dated: January 11, 2021

Respectfully submitted,

**KESSLER TOPAZ
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/s/ Sharan Nirmul

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